

**UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS**

UNITED STATES OF AMERICA,

v.

GREGORY COLBURN, et al.,

Defendants.

Case No. 19-CR-10080-NMG

DEFENDANT I-HSIN “JOEY” CHEN’S WITNESS EXHIBIT LIST

Defendant I-Hsin “Joey” Chen respectfully submits the following initial list of potential witness for the January 2022 trial brought by the government against himself and fellow defendants Gregory Colburn, and Amy Colburn. Defendant reserves the right to supplement this list with reasonable notice to the government, and to call additional rebuttal witnesses not identified here. Defendant also reserves the right to call as a witness any witnesses listed by the government.

Name	Entity/Location
David Han	Orange County, California
Yun Han	Orange County, California
Dr. Anna Baumgartner	Orange County, California
Jacqueline Mannix	Los Angeles, California
Hui Hsu	Los Angeles, California
Andrew Donner	San Diego, California

Belinda Donner	San Diego, California
Charlie Donner	San Diego, California
John Su	San Marino, California
Jameson Lee	Alhambra, California
Chris Cowser	Champaign, Illinois
Rick Cowser	Champaign, Illinois
Teresa Cowser	Champaign, Illinois
Dr. Thanh Le	Long Beach, California
Dr. Charles Chang	Boston, Massachusetts
Efren Lapuz	San Diego, California
Dr. Anna Baumgartner	Orange County, California
Special Agent Lauren Smith	FBI

Dated: November 19, 2021

Respectfully submitted,

/s/ Reuben Camper Cahn

Reuben Camper Cahn (*pro hac vice*)
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Counsel for I-Hsin "Joey" Chen

CERTIFICATE OF SERVICE

In accordance with Local Rule 5.2(b), I, Reuben Camper Cahn, hereby certify that on November 19, 2021 this document filed through the ECF system will be sent electronically to the registered participants as identified in the Notice of Electronic Filing (NEF) and paper copies will be sent to those indicated as non-registered participants.

/s/Reuben Camper Cahn
Reuben Camper Cahn